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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

11 STATE OF WASHINGTON, et al.,

12 Plaintiffs,

13 v.

14 Donald TRUMP, et al.,

15 Defendants.

Case No. 2:25-cv-00127-JCC

**DECLARATION OF CHERLY  
DANIRA NORALES CASTILLO**

16 I, Cherly Danira Norales Castillo, hereby declare:  
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18 1. My name is Cherly Danira Norales Castillo. I am over the age of 18 and am  
19 competent to testify regarding the matters described below. I am a putative class member in this  
20 case.

21 2. I am a citizen of Honduras. I currently live in Seattle, Washington.

22 3. I have lived in the United States since May 2023.

23 4. I live with my partner and my four-year-old son.

1           5.       I was born and grew up in Honduras. Growing up, I lived with my parents and  
2 eight siblings. It was a very difficult life. There's a lot of violence in Honduras, especially a lot  
3 of violence toward women. As I got older, I experienced personally some of that violence. I  
4 eventually had children of my own, one born in 2010, the next in 2014, and the third in 2020.

5           6.       I felt unsafe in my country due to my experiences there. I did not feel that the  
6 police in Honduras could protect me or my children from these terrifying situations. For this  
7 reason, I decided to flee to the United States.

8           7.       When I arrived in the United States, I went to Seattle, because my current partner  
9 was already in the United States and was settled there.

10          8.       I applied for asylum in the Immigration Court and have received a work permit  
11 while my application is pending.

12          9.       I found out on or around July 2024 that I was pregnant with the child of my  
13 current partner. My healthcare provider told me that my expected due date is March 19, 2025.

14          10.      I heard about the president's executive order regarding birthright citizenship on or  
15 about January 20, 2025.

16          11.      I understand that, as I am not a U.S. citizen or lawful permanent resident (LPR) in  
17 the U.S., and as the father of my child is also not a U.S. citizen or LPR, the government will not  
18 recognize my child's U.S. citizenship by birthright if they are born on or after February 19, 2025.

19          12.      I am fearful for my unborn child's future in light of this executive order.

20          13.      I am afraid that I will not be able to support my child if they are not entitled to the  
21 benefits of citizenship. My family currently relies on some public benefits in order to get by each  
22 month. I am fearful that if my baby's citizenship is not recognized and if policies continue to  
23 change, we will be cut off from some or all of these benefits. I also do not want my unborn child

1 to have to go back to Honduras, where I have suffered much fear and abuse. I want my family to  
2 be together, not separated, and if my child is not a citizen, I fear the child could be targeted by  
3 immigration enforcement. I also want my child to have an education in the United States and be  
4 able to access all of the opportunity here for citizens, like the ability to work. I have already  
5 pulled my youngest child out of school in the United States because I am fearful of these recent  
6 changes to immigration policies and because I am struggling to get him to school every day, as  
7 my partner has to work and cannot offer me extra help while I am pregnant.

8 14. I want to be a named plaintiff in this case and I understand that if the Court grants  
9 the motion for class certification, I would represent a large number of people who: (a) are not  
10 LPRs or U.S. citizens; and (b) are expecting a child who will likely be born after the executive  
11 order goes into effect, and therefore the government will not recognize their children's U.S.  
12 citizenship by birthright.

13 15. I also understand that the group of people I would represent includes both  
14 expectant parents who will be subject to the president's executive order on or after February 19  
15 and those who will be subjected to the executive order in the future, including people who  
16 become pregnant after the order goes into effect.

17 16. I understand that, as a class representative, I represent the interests of all class  
18 members in this lawsuit and that it is my responsibility to represent the interests of the whole  
19 class and not just my own personal interests.

20 17. I understand that my duty to be a class representative continues until the Court  
21 decides this case is no longer a class action, or the case is over.  
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1           18. I understand and accept that any resolution of the lawsuit, for example by  
2 settlement and dismissal, is subject to Court approval and must be in the best interests of the  
3 class as a whole.

4           19. I understand that, by agreeing to become a class representative, I have a duty to  
5 take steps to help move the case forward, which I will do with my attorneys. I know that I must  
6 provide information to my attorneys that they feel is necessary for the case; give them documents  
7 I have if it is required; testify at a deposition or trial if necessary; and provide my attorneys with  
8 my contact information and current whereabouts because it may be necessary for them to contact  
9 me on short notice.

10           20. I understand that I am volunteering to represent many other families with similar  
11 claims. I believe it is important that all expectant parents with soon-to-be-born children who will  
12 be subject to these practices, as I and my unborn child will be, benefit from the lawsuit.

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14           I, Cherly Danira Norales Castillo, declare under penalty of perjury of the laws of the  
15 State of Washington and the United States that the foregoing is true and correct to the best of my  
16 knowledge and belief.

1 Executed in Seattle, Washington on January 22, 2025.

2  
3 By: Cherly D. Norales  
Cherly Danira Norales Castillo

**CERTIFICATE OF INTERPRETATION**

I, Sydney Maltese, hereby certify that I read the foregoing to [NAME] in Spanish, and that she indicated that she understood and agreed to the contents. I further certify that I am competent in both English and Spanish to render and certify such interpretation.

DATED this 22nd day of January, 2025.



Sydney Maltese  
Northwest Immigrant Rights Project  
615 Second Ave., Ste. 400  
Seattle, WA 98104